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Attorneys for Plaintiff JESUS GUZMAN,
as an individual and on behalf of all employees similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

JESUS GUZMAN, as an individual and on
behalf of all employees similarly situated,

Plaintiff,

v.

CORE ENVIRONMENTAL SOLUTIONS, a
California Corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 24STCV03593

[Assigned for all purposes to Hon. Theresa M.
Traber]

**[PROPOSED] JUDGMENT FOLLOWING
ORDER GRANTING FINAL APPROVAL
OF CLASS AND PAGA REPRESENTATIVE
ACTION SETTLEMENT**

Date: October 10, 2025
Time: 10:30 a.m.
Courtroom: Dept. 1
Judge: Hon. Theresa M. Traber

Action Filed: February 13, 2024
Trial Date: Not Set

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 Plaintiff JESUS GUZMAN (“Plaintiff”) and Defendant CORE ENVIRONMENTAL
3 SOLUTIONS (“Defendant”) reached terms of settlement for a putative class and PAGA representative
4 action. On or about October 10, 2025, the Court issued an Order granting Plaintiff’s motion for final
5 approval of a proposed class and PAGA representative action settlement of the claims asserted against
6 Defendant in this action (“Final Approval Order”). The settlement is memorialized in the CLASS
7 ACTION AND PAGA REPRESENTATIVE ACTION SETTLEMENT AGREEMENT (see Declaration
8 of Lilit Tunyan In Support of Plaintiff’s Motion for Final Approval of Class and PAGA Representative
9 Action Settlement [Tunyan Decl.], at Exh. 1) which is referred to herein as the “Settlement” or
10 “Settlement Agreement”.

11 The Court’s Final Approval Order is incorporated herein in its entirety. The Court now enters
12 Judgment following the entry of the Final Approval Order. The Judgment set forth herein is intended to
13 be a final disposition of the Action in its entirety and is intended to be immediately appealable.

14 **JUDGMENT**

15 In accordance with and for the reasons stated in the Final Approval Order, Judgment shall be
16 entered whereby the Plaintiff, all Settlement Class Members, and all PAGA Employees shall take
17 nothing from Defendant, except as expressly set forth in the Final Approval Order and the Settlement.

18 The Class Members are:

19 All non-exempt, hourly employees of Defendant who worked for Defendant in
20 California during the Class Period (the “Class Period” is February 13, 2020 through
January 11, 2025.)

21 There were no objections, requests for exclusion or workweek disputes submitted by Class
22 Members.

23 The Court also defines the following “PAGA Employees” impacted by the proposed settlement
24 of PAGA claims:

25 All non-exempt, hourly employees of Defendant who worked for Defendant in
26 California during the PAGA Period (the “PAGA Period” is February 13, 2023 through
27 January 11, 2025.)

28 Class and PAGA Representative Action claims are released, pursuant to the terms of the

Settlement, as follows:

Effective on the date when Defendant fully funds the entire Gross Settlement Amount and funds all employer-side payroll taxes owed on the Wage Portion of the Individual Class Payments, Plaintiff, Class Members, and Class Counsel will release claims against all Released Parties as follows:

Release by Participating Class Members Who Are Not Aggrieved Employees: All Participating Class Members, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, release Released Parties from any and all claims, charges, complaints, liens, demands, causes of action, obligations, damages and liabilities, known or suspected, that each Settlement Class Member had, now has, or may hereafter claim to have against the Released Parties stated in the Plaintiff's Operative Complaint, raised by Plaintiff to the LWDA (in the PAGA Notice or elsewhere), or that could have been stated based on the facts alleged in the Operative Complaint or PAGA Notice to the LWDA ("Released Class Claims"). The Released Class Claims include without limitation violations of Labor Code sections 90.5, 201, 202, 203, 204, 226, 226.7, 510, 512, 558, 1174, 1174.5, 1175, 1194, 1194.2, 1197, 1197.1, 1198, 2802; applicable IWC Wage Orders, including but not limited to Nos. 3-2001 and 5-2001; Code of Regulations, Title 8, Section 11000 et seq., and Business & Professions Code section 17200, et. seq. If Participating Class Members are also PAGA Group Members, they also hereby are deemed to release the Released Parties, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, from all claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on the PAGA Period facts stated in the Operative Complaint and/or the PAGA Notice, including without limitation all PAGA penalties based on claims of the Labor Code sections, IWC Wage Orders, or regulations cited above. Participating Class Members do not release any other claims, including claims for vested benefits, wrongful termination, violation of the Fair Employment and Housing Act, unemployment insurance, disability, social security, workers' compensation, or claims based on facts occurring outside the Class Period.

Release by Non-Participating Class Members Who Are PAGA Employees: All Non-Participating Class Members who are PAGA Group Members are deemed to release, on behalf of themselves and their respective former and present representatives, agents, attorneys, heirs, administrators, successors, and assigns, the Released Parties from all claims for PAGA penalties that were alleged, or reasonably could have been alleged, based on the PAGA Period facts stated in the Operative Complaint and the PAGA Notice, including without limitation PAGA penalties based on claims of alleged violations of Labor Code sections 90.5, 201, 202, 203, 204, 226, 226.7, 510, 512, 558, 1174, 1174.5, 1175, 1194, 1194.2, 1197, 1197.1, 1198, 2802; applicable IWC Wage Orders, including but not limited to Nos. 3-2001 and 5-2001; Code of Regulations, Title 8, Section 11000 et seq., and Business & Professions Code section 17200, et. seq.

"Released Parties" means: Defendant and each of its former and present directors, officers, shareholders, owners, agents, employees, attorneys, insurers, reinsurers, predecessors, successors, assigns, administrators, fiduciaries, trustees, principals, heirs, representatives, accountants, auditors, and consultants.

Distributions pursuant to the Settlement shall issue in the amounts authorized in the Final Approval Order, according to the deadlines specified in the Settlement.

Pursuant to California Code of Civil Procedure Section 664.6 and Rule 3.769(h) of the California Rules of Court, this Court reserves exclusive and continuing jurisdiction over this action, the Plaintiff,

1 Settlement Class Members, and Defendant, for the purposes of:

2 (a) supervising the implementation, enforcement, construction, and interpretation of the
3 Settlement, the Preliminary Approval Order, the plan of allocation, the Final Approval Order,
4 and the Judgment; and

5 (b) supervising distribution of amounts paid under this Settlement.

6 **IT IS SO ORDERED.**

7 Dated: _____

Hon. Theresa M. Traber
LOS ANGELES COUNTY SUPERIOR COURT JUDGE

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss
4 COUNTY OF LOS ANGELES)

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action; my business address is 355 S. Grand Ave., Suite 1450
Los Angeles, California 90071.

7 On the date indicated below, I served the document described as: **[PROPOSED] JUDGMENT**
8 **FOLLOWING ORDER GRANTING FINAL APPROVAL OF CLASS AND PAGA**
9 **REPRESENTATIVE ACTION SETTLEMENT** on the interested parties in this action by sending a
true copy thereof to interested parties as follows and as stated on the attached service list:

10 Seth Weisburst
sweisburst@grsm.com
11 Christopher Keller
ckeller@grsm.com
12 Vanessa Santellan
vsantellan@grsm.com

13 **GORDON REES SCULLY MANSUKHANI, LLP**
275 Battery Street, Suite 2000 San Francisco, California 94111
14 Telephone: (415) 986-5900
Facsimile: (415) 986-8054

15 **Attorneys for Defendant CORE ENVIRONMENTAL SOLUTIONS**

16
17 ☒ **BY ELECTRONIC SERVICE:** Based on a court order or an agreement of the parties
18 to accept electronic service, I caused the documents to be sent to the persons at the
19 electronic service addresses listed above via third-party cloud service
CASEANYWHERE. I did not receive an error message.

20 I declare under penalty of perjury under the laws of the State of California that the
21 above is true and correct.

22 Executed on September 8, 2025 at Glendale, California.

23 KAREN ARELLANO

24 Name

Signature